

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<b>IN RE:</b>	)	
	)	
<b>GREEN COPPER HOLDINGS, LLC</b>	)	<b>CASE NO. 25-10088-T</b>
<b>EIN # xx-xxx9708</b>	)	<b>Chapter 7</b>
	)	
<b>COPPER TREE, INC.</b>	)	<b>Substantively Consolidated</b>
<b>EIN # xx-xxx6608</b>	)	
	)	
<b>Debtors.</b>	)	

**TRUSTEE’S OBJECTION TO AMENDED PROOF OF CLAIM NO. 3-2 FILED HEREIN  
BY NOLA RENEE NICHOLS (“NICHOLS”) AND NOTICE OF OPPORTUNITY FOR  
HEARING**

Comes now the Trustee and states:

1. Nichols originally filed proof of claim No. 3 for the sum of **\$396,975**.
2. The Trustee objected to that claim (Doc. No. 133).
3. Nichols has now filed an amended proof of claim No. 3-2 for the sum of **\$246,975**.
4. The Trustee objects to the amended proof of claim on the basis that neither of the two proofs of claim support the sums sought to be recovered.
5. In addition, Nichols was at all times material an insider of the Debtor and the asserted claim exceeds the reasonable value of services provided to the Debtor. As result, Claim 3-2 should be denied to the extent the amount of the claims exceeds the value of any services pursuant to 11 U.S.C. s 502(b)(4).
6. The Trustee intends to seek an order disallowing Claim No. 3-2 in its entirety or allowing such Claim for a limited sum under quantum meruit principles.

**NOTICE OF OPPORTUNITY FOR HEARING - Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Northern District of Oklahoma, 224 South Boulder, Tulsa, Oklahoma 74103 no later than 33 days from the date of filing of this request for relief. You should also serve a file-stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The 33-day period includes the three (3) days allowed for mailing provided for in Fed. R. Bankr. P. 9006(f).**

Respectfully Submitted by:

/s/ Patrick J. Malloy III  
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